

1 Sherrod failed to adequately train and supervise employees
2 prior to the August 6th, '02 incident. On what is that
3 statement based?

4 A. Who made that claim?

5 Q. The Defendant.

6 MR. MARTINUCCI: He's not the Defendant.

7 A. I'm not the Defendant.

8 Q. Well, you were there on August 6th, '02. I'm
9 looking at a letter dated September 24th that basically says
10 you didn't do your job. I'm asking you on what did you base
11 the claim?

12 A. Can you repeat the question, please, Counsel.

13 MS. BENSON: Why don't we have the court reporter
14 read it back.

15 A. She can if she would like to.

16 (Court reporter reads back question.)

17 A. Again, within this letter that you're referring to.

18 Q. No, answer the question.

19 A. I'm about to, because you did refer to this letter
20 and that information is not there. The claim made that he
21 failed to supervise and train employees, I have no idea what
22 you're talking about.

23 Q. There's a claim and I'm not referring to any
24 document.

25 A. Okay.

1 Q. This is the Defendant's overall posture in this
2 case?

3 A. Well, I don't know the Defendant's overall posture
4 in this case.

5 Q. Are you saying to me that you participated in
6 preparing an Answer in New Matter and you don't --

7 A. I'm saying I provided information and that's it.

8 MR. MARTINUCCI: And for the record, I'll tell you
9 right now he did not participate directly in the
10 preparation of the Answer in New Matter. That was
11 prepared after he left the Board. It was based in
12 large part on information he had provided
13 previously, but I did not sit down and review the
14 Answer in New Matter with Mr. Coleman.

15 MS. BENSON: Well, he was involved one way or
16 another with the preparation of the Answer. You're
17 saying to me now that he did provide you with
18 information.

19 A. Well, see what you're asking me to do is take the
20 position of the Defendant. I don't know the position of the
21 Defendant and you're asking me questions based on their
22 case.

23 Q. But you do know that the Board fired Mr. Sherrod.

24 A. You can ask questions based on what I do know, not
25 on what I don't know.

1 Q. All right.

2 A. Because I can't answer those questions.

3 Q. Wait a minute.

4 A. Work with me now.

5 Q. No, you just listen and answer the question. All
6 right.

7 A. Okay.

8 Q. You do know that the Defendant fired the Plaintiff,
9 correct?

10 A. Correct.

11 Q. You were there when they did so.

12 A. Correct.

13 Q. You were part of the discussions, correct?

14 A. Correct.

15 Q. And so you know the reasons that they gave for
16 doing so, right.

17 A. Correct.

18 Q. Now, Mr. Coleman.

19 A. Yes.

20 Q. You claim that you had suggested to the Board that
21 Mr. Lester Howard not be fired. What was your basis for
22 that suggestion?

23 A. Because even after conversations that Mr. Sherrod
24 had and I said the same thing to your client here, Mr.
25 Howard didn't have any direct supervision of any of the

1 kids. He was not responsible for doing any of the head
2 counts or tracking the kids, nor was he responsible for the
3 transportation of the children, to my understanding.

4 Q. Now, in September of '02?

5 A. Uh-huh.

6 Q. When the termination letter, Plaintiff Exhibit
7 Number 2, was sent to Mr. Sherrod. Isn't it true that Mr.
8 Sherrod was not under any disciplinary action in September
9 of '02?

10 A. I'm not sure. What do you mean not under any
11 disciplinary action?

12 Q. Isn't it true that Mr. Sherrod was not under any
13 disciplinary action in September of '02?

14 A. No, I think he was suspended during that time.

15 Q. Is there any written documentation that he was
16 suspended at that time?

17 A. If there is it would be at the Center, I don't have
18 that information.

19 Q. So you don't recall sending a letter to him saying
20 you're suspended.

21 A. I don't recall it, no.

22 Q. Chances are it didn't happen; isn't that correct?

23 A. Chances are it could have happen, that's correct.

24 Q. Chances are it didn't happen; isn't that correct?

25 A. Depends on how you look at it. Like I said, I

1 don't recall.

2 Q. Mr. Coleman, are you making yourself available to
3 testify at this matter in trial?

4 A. Aren't I obligated, don't I have to? I would
5 appreciate not to if you could avoid that because I will be
6 starting a new job soon.

7 Q. Mr. Coleman, do you recall the August 12th, '02
8 meeting with the staff of the Booker T. Washington Center on
9 August the 13th of '02?

10 A. I do recall meeting with the staff, but I'm not
11 sure if it was the 13th or the 14th. But I do recall
12 meeting with the staff.

13 Q. Now, the purposes of that meeting was to tell the
14 staff where things stood with regard to Mr. Sherrod; is that
15 correct?

16 A. Yes.

17 Q. Now, in that meeting weren't you asked to confirm
18 that in directing Mr. Sherrod to fire Mr. Howard, Mr.
19 Johnson and Ms. Smith --

20 A. Smith.

21 Q. -- Smith, that you used the word nigger?

22 A. I don't recall because, number one, I can't confirm
23 that because I didn't make that direction or instruction. I
24 didn't direct anyone to fire anyone.

25 Q. So if I brought in every single staff member

1 present at that meeting on August the 13th --

2 A. And there was a Board member also.

3 Q. That's right. And that Board member was who?

4 A. Paul Gambill.

5 Q. If I brought in every single member at that meeting
6 and they said that you used the word nigger in telling Mr.
7 Sherrod to fire those individuals they would all be lying.

8 A. Yes, because I did not instruct Mr. Sherrod to fire
9 anyone.

10 Q. Did you use the word nigger in reference to Mr.
11 Johnson, Mr. Howard, and Ms. Smith?

12 A. No.

13 Q. Now the Defendant, in response to a request for
14 admissions, says that you did. I'll read it to you.

15 A. Please do.

16 Q. Just give me a moment.

17 MR. MARTINUCCI: why don't you let me show it to
18 him?

19 MS. BENSON: I would prefer to read it to him.

20 A. Just let me see it.

21 MS. BENSON: I want to read it to him. I'll be
22 accurate.

23 MR. MARTINUCCI: well, fine, you can read it to him
24 and he can look at it too.

25 MS. BENSON: No, I want to read it, I don't know

1 what's on your document.

2 MR. MARTINUCCI: You know what, here take a look at
3 what's on my page. See if it's the same thing
4 that's on yours.

5 MS. BENSON: I have mine, thank you. This is what
6 it says.

7 MR. MARTINUCCI: You're referencing Number 24.

8 MS. BENSON: No, I'm referencing Number 25 and this
9 is the question.

10 Q. Let me read it to you, Mr. Coleman.

11 A. Sure.

12 Q. I'm going to read you the question and then I'll
13 read you the answer. And you don't have to read that, you
14 can just listen to me.

15 A. I'd like to read it.

16 MR. MARTINUCCI: Or if you want to read it you can
17 read it.

18 A. I'll read it.

19 MS. BENSON: No, this is my deposition. Put that
20 book away, I'll read it to you.

21 A. Who are you yelling at, calm down.

22 MS. BENSON: No, that's being disrespectful.

23 A. No, what's disrespectful is that you asked me to
24 tell you something that the Defendant said.

25 MS. BENSON: I'll read it to you.

1 Q. Now, Mr. Coleman, I'm not at this point asking you
2 to look at a document that you apparently were --

3 A. So how can you read something to me --

4 MR. MARTINUCCI: Here, go ahead. Let her read it
5 to you.

6 Q. This is the question, that on or about August the
7 13th, 2002 in a meeting with the Center staff, Mr. Sean
8 Coleman, the Center's vice president admitted calling
9 African American employees niggers. Defense answer, they
10 admitted in part and denied it in part. It is admitted that
11 a Coleman, also african American, acknowledged using the
12 word nigger or niggers or some derivative of that word. Now
13 I'm going to go back.

14 MR. MARTINUCCI: Derivation.

15 MS. BENSON: Derivation.

16 Q. I want to go back at this point, back to the
17 meeting and your memory of August the 13th.

18 A. Correct.

19 Q. Did you in that meeting acknowledge referring to
20 Mr. Howard, Mr. Johnson, and Ms. Smith as niggers?

21 A. No.

22 MR. MARTINUCCI: And for the record, I'm going
23 to read in the rest of the response to the Request
24 for Admissions. Upon information and belief,
25 however, it is denied that Coleman's use of this

1 word was necessarily restricted to African American
2 employees. As Plaintiff is aware, Coleman is no
3 longer a member of the Defendant's Board of
4 Directors and has moved from the area,
5 parenthetical on my point which was my
6 understanding at the time that these were prepared.
7 Continuing on the response. The Defendant has been
8 unable to contact Coleman to ascertain the specific
9 scope and context of this reference as referred to
10 in the Request for Admissions. This response for
11 Request for Admissions will be supplemented at such
12 time as the parties are able to depose Mr. Coleman,
13 which is what we're here for today.

14 BY MS. BENSON:

15 Q. Mr. Coleman.

16 A. Yes.

17 Q. As an African American you are and have heard the
18 word nigger, right?

19 A. Absolutely.

20 Q. And as an African American you are aware that word
21 is only directed to people of African decent; aren't you?

22 A. That is not correct.

23 Q. Mr. Coleman, the three individuals that were fired
24 from the Booker T. Washington Center on August the 7th were
25 all African Americans; isn't that correct?

1 A. Yes.

2 Q. And then on August the 12th, the other individual
3 fired was an African American, Mr. Sherrod.

4 A. Correct.

5 Q. And during the time period of August 5th to August
6 the 9th of 2002 the controller was in charge of the Booker
7 T. Washington Center; isn't that correct?

8 A. I believe so.

9 Q. And the controller is a white individual; isn't
10 that correct?

11 A. Correct.

12 Q. Now, the Board in dealing with the incident of
13 August the 6th, 2002 has never taken any action against the
14 controller, has it?

15 A. At the time I was there, no.

16 Q. Did you ever recommend that the Board do so?

17 A. Yes.

18 Q. You recommended that the Board take action?

19 A. Yes, I did.

20 Q. And when did you recommend that?

21 A. That would have been at -- that would have been at
22 a meeting between -- again, August -- sometime in one of
23 those meetings in August, exactly when, I have no idea.

24 Q. Which meeting in August?

25 A. I just told you, exactly when I have no idea. I

1 don't recall.

2 Q. Was the meeting recorded?

3 A. I don't know if it was a regular Board meeting or
4 an executive committee.

5 Q. Did you take notes of that meeting?

6 A. I rarely took notes at any meeting.

7 Q. Well, you have quite a few there.

8 A. These aren't notes from meetings, these are notes
9 from conversations regarding this incident.

10 Q. At that meeting do you recall taking any notes?

11 A. I don't recall.

12 Q. Do you have any documentation that will show that
13 you made such a recommendation?

14 A. No, I don't.

15 Q. Who on the Board of Directors do you think would
16 recall such a recommendation?

17 A. Whomever was there. Again, I don't recall exactly
18 who was there. Jeffress was there, I believe, Fries was
19 there, McAdory was there, several other members, I don't
20 recall who.

21 Q. And what reason did you give them for taking action
22 against the controller?

23 A. Well, again it wasn't until the 12th that I found
24 out that the controller was supposed to be in charge. All
25 right. But, again, as I mentioned the controller stated

1 that all he was told to do was contact Mr. Sherrod, which he
2 said he had done. My reason was, again, because he was the
3 -- prior to me finding out that bit of information, after
4 finding out that he was in charge, that then he should have
5 some type of disciplinary action as well.

6 Q. So on August the 12th you felt that the
7 controller-- action should have been taken against the
8 controller.

9 A. After I found out he was in charge, yes.

10 Q. And you found this out on August the 12th you said.

11 A. Yes.

12 Q. And it was in a meeting that you did so, that you
13 found this out.

14 A. Yes, from Mr. Sherrod.

15 Q. The entire Board, or the people that you meet with,
16 heard your recommendation regarding the controller.

17 A. Yes, I believe it would have been at the executive
18 committee meeting on the -- I don't want to misstate. I
19 think it would have been at the executive committee meeting
20 on the 13th, but it could have possibly been the next Board
21 meeting the following week.

22 Q. Was it where there was this large number of people?

23 A. No, there was only about -- that's why I'm trying
24 to identify. It was only six people, if that.

25 Q. Can you recall who they were?

1 A. I can recall three who were there, Jeffress,
2 McAdory and Fries. The other members I can't recall.

3 Q. Now, at a subsequent Board meeting did you also
4 make that recommendation to the Board?

5 A. I don't remember.

6 Q. Might you have?

7 A. I don't remember, I don't recall.

8 Q. Is it possible that you did?

9 A. It's always possible, but, again, I don't recall.

10 Q. But for as long as you remained on the Board the
11 Board took no disciplinary action against the controller?

12 A. No, not to my knowledge.

13 Q. Mr. Coleman, if I can go back to your conversation
14 on the night of August the 6th.

15 A. Uh-huh.

16 Q. Did you advise Mr. Sherrod that you knew the family
17 and would therefore contact them?

18 A. I think I told him I knew -- let me see. I'm
19 trying to think. I'm not sure if I realized I knew the
20 family or I knew the family members. I didn't know the
21 immediate family. But the woman's -- this would be Briana's
22 mom, her father is a relative to my son. So it's like --
23 you know how we do. It's like one of those type of deals.
24 I knew of the family, but that was it.

25 Q. Okay. Mr. Coleman, at some point the Booker T.

1 Washington Center made a decision to advertise for the
2 availability of Mr. Sherrod's position.

3 A. Uh-huh.

4 Q. At what point did Mr. Bill Jeffress express an
5 interest in Mr. Sherrod's position?

6 A. He didn't express an interest in Mr. Sherrod's
7 position, he expressed an interest in the vacant executive
8 director's position. And, I believe, that was -- I'm not
9 sure, it was sometime in the winter. I'm not sure if it was
10 December, I think it was December. I think I'm not
11 particularly sure.

12 Q. Was it before you started advertising for the
13 position?

14 A. Again, I don't recall.

15 Q. Now, how did Mr. Jeffress's, who's the current
16 director go about expressing his interest in the executive
17 directorship?

18 A. I believe he had sent a -- again, I'm not sure if
19 it was an e-mail or a written letter. But he had sent a
20 notice of correspondence.

21 Q. Do you know who he sent that to?

22 A. To the members of the Board.

23 Q. Do you have a copy of that?

24 A. No, I don't.

25 Q. Now, who served as the -- did anyone serve as an

1 interim director pending the selection of Mr. Jeffress?

2 A. I don't recall how that process went.

3 Q. Were you on the search committee?

4 A. In fact, what we had done is when we began to
5 receive application, I believe, Mr. Jeffress did start off
6 as the interim director.

7 Q. Were you on the search committee?

8 A. Yes.

9 Q. Who conducted the search? Was this a normal Board
10 committee or --

11 A. I think what we did -- I think it was pretty much
12 the executive committee, I believe, I think. I can't be
13 sure, but I think it was the executive committee.

14 Q. How can we find out who constituted the search
15 committee?

16 A. Talk to the members of the Board or to that Board.

17 Q. So through your letter --

18 A. Whose letter.

19 Q. I'm referring back to the notice that you sent to
20 Ms. Smith, Anita Smith, dated August the 21st of 2002, that
21 appointed her to manage the program on a day-to-day basis.
22 How long did Ms. Smith serve in this temporary capacity?

23 A. I don't remember.

24 Q. After Ms. Smith, who took over after her?

25 A. It was Mr. Jeffress.

1 Q. So it was an immediate take over after that.

2 A. I'm not sure how you define immediate. I can't say
3 if it was immediate or not, because I'm not sure how long
4 Ms. Smith has had served in that capacity.

5 Q. You have no idea when Mr. Jeffress first expressed
6 an interest in the position.

7 A. No, like I said --

8 Q. Did anybody else on board express an interest in
9 the position?

10 A. No, not to my knowledge.

11 Q. So he was the only one. Mr. Coleman, I'll show you
12 what will probably become, I think, should be Exhibit Number
13 6. I'll give you a few seconds to review that.

14 (Plaintiff Exhibit Number 6 marked for
15 identification.)

16 A. Okay.

17 Q. And there's a notation, as you can see on here that
18 says letter from Mr. Jeffress to the Board.

19 A. Correct.

20 Q. In reviewing both this handwritten note and this
21 typed written note, any idea when this was given to the
22 Board?

23 A. No, again I thought it was sometime in the winter,
24 but I don't have any recollection.

25 Q. Is this what you were referring to?

1 A. Yes.

2 Q. So it doesn't look like it was an e-mail, it looks
3 like --

4 A. I said it could have been possibly an e-mail or a
5 written notice, I did say that.

6 Q. Now, the first statement in the second sentence in
7 this, it says -- let me read the first statement and second.
8 In order to better serve the Booker T. Washington community
9 I am proposing to executive committee that I be allowed to
10 step down as chair of the management committee and the BESSETTI
11 Board. This will enable me to assist in the facilitation of
12 a smooth transaction (sic) with its current director, Mr.
13 James Sherrod.

14 MR. MARTINUCCI: Transition.

15 Q. I'm sorry, transition with its current director,
16 Mr. James Sherrod. Does that statement help you in so far
17 as trying to figure out when Mr. Jeffress expressed an
18 interest in executive director?

19 A. No, it probably was sooner than I thought it was.

20 Q. I'm sorry

21 A. It just helped me refresh that it was sooner than I
22 thought it was.

23 Q. Was it before September the 24th, '02?

24 A. I have no idea.

25 Q. Mr. Coleman, I only have one copy of this, but

1 you're probably familiar with this. It's the incident
2 report prepared by Anita Smith, dated August the 6th, '02.
3 Does that look familiar to you at all?

4 A. Yes.

5 Q. Can you tell me whether the Board of Directors or
6 any committees of the Board ever had a copy of Ms. Smith's
7 report?

8 A. I believe the entire Board got a copy of this.

9 Q. Any idea when they might have received a copy of
10 it?

11 A. I think -- I'm not sure if Anita presented it or I
12 -- the August 12th meeting, I believe.

13 Q. So you think she might have presented it then also?

14 A. I think she gave a copy of it at that meeting.

15 Q. You made a recommendation to the Board that they
16 take disciplinary action against the controller?

17 A. It wasn't a recommendation, it was a suggestion.

18 Q. Suggestion.

19 A. Yes.

20 Q. What was your suggestion?

21 A. I think it was very general, I said that something
22 should be done to Brian as well if he was in charge. And I
23 think that was the basis of it.

24 Q. Did you make a recommendation with regard to Mr.
25 Sherrod?

1 A. At what point?

2 Q. At any time beginning from the very first meeting,
3 I think it was a committee meeting or Board meeting. Did
4 you make any recommendation for Mr. Sherrod and what
5 disciplinary action should be taken?

6 A. Again, with Mr. Sherrod there was a discussion. I
7 don't think I made a recommendation. I don't recall as
8 much, but we had discussed and then voted on the action to
9 be taken against Mr. Sherrod.

10 Q. And was that at the August 12th, '02 meeting?

11 A. Yes.

12 Q. What was your suggestion with regard to Mr.
13 Sherrod?

14 A. Again, it was a collective decision to ask for Mr.
15 Sherrod's resignation.

16 Q. But did you make your own personal recommendation
17 to the Board as to what --

18 A. Again, I supported the decision. I gave my input
19 and my input was that we should ask for his resignation as
20 well.

21 Q. That was your opinion.

22 A. Yes.

23 Q. Mr. Coleman, are you aware of any other Board
24 members being actively involved in the investigation
25 surrounding the incident of August the 6th, '02?

1 A. Yes.

2 Q. And can you identify those Board members?

3 A. I don't know all of them, but Mr. Hamilton, Mr.
4 Jeffress, Mr. Gambill, I believe Mr. Fries. There were
5 probably more, but they are the four that come to mind.

6 Q. What did Mr. Hamilton, who was the Board chair at
7 that time, do?

8 A. Again, he pretty much directed what type of
9 information we should get. What type of data we needed to
10 collect.

11 Q. Was that in preparation for the executive committee
12 meeting that you have testified to before?

13 A. It was in preparation of that as well -- I mean, he
14 was kind of like steering the ship after that point.

15 Q. After which point?

16 A. The 12th, after that meeting -- or after the
17 meeting on the 9th, I'm sorry.

18 Q. So after the meeting on August the 9th -- Mr.
19 Hamilton was steering the matter?

20 A. Well, he was the chairperson, he was functioning as
21 his capacity as chairperson.

22 Q. How would you characterize your role after Mr.
23 Hamilton began acting as Board chair?

24 A. My capacity was still the same, I was functioning
25 as the capacity of vice chair.

1 Q. As the two of you, who was the most active?

2 A. Probably, up to a point, myself because his work
3 conflicted with the times we had met for meetings. And so
4 up until this point, myself. Then I can't say who was the
5 most active because we were doing different things, we had
6 different capacities.

7 Q. So the meeting of August the, I think, the 9th was
8 Mr. Hamilton there?

9 A. Was he there. I want to say, yes, because he had
10 instructed me to get data the day before. I can't recall if
11 he was present or not, I believe he was.

12 Q. The meeting of August the 12th, was Mr. Hamilton
13 there?

14 A. Yes, I believe he was.

15 Q. The meeting of August the 13th, was Mr. Hamilton
16 there?

17 A. I'm not sure.

18 Q. Do you know whether Mr. Hamilton ever met with Mr.
19 Martinucci regarding the incident of August the 6th, '02 and
20 then the letting go of Mr. Sherrod?

21 A. I don't know.

22 Q. Now, Mr. Jeffress, you say was involved. What did
23 Mr. Jeffress do?

24 A. I mean, again, it was just a matter of taking the
25 data, reviewing the information, and seeing what the action

1 would be.

2 Q. Taking data from where, Mr. Jeffress?

3 A. No, I'm saying collectively. I don't recall
4 specifically what he did. It was just that we had this
5 information, we went through and then we developed an action
6 plan or course of action.

7 Q. When you say we who are you referring to?

8 A. The members of the executive committee.

9 Q. To your knowledge did Mr. Jeffress do anything on
10 his own?

11 A. I don't know.

12 Q. For instance, like have conversations with Mr.
13 Sherrod.

14 A. I'm sure he did, I know he did have conversations
15 with Mr. Sherrod. But other than that I don't know, you
16 have to ask Mr. Jeffress.

17 Q. Do you know if he reported to the Board on those
18 conversations?

19 A. Yes.

20 Q. When did he report to the Board on those
21 conversations?

22 A. At whatever subsequent meetings we attended.
23 Because Mr. Jeffress was also a member of the executive
24 management committee. So where and when I don't know, but
25 I've got to presume at those particular meetings.

1 Q. Mr. Paul Gambill, what did Mr. Gambill do? You've
2 testified earlier that he was at the meeting of the staff on
3 August the 13th?

4 A. Yes, right.

5 Q. What else did Mr. Gambill do?

6 A. I don't know, I can't recall.

7 Q. And Mr. Fries.

8 A. Mr. Fries, he was on the management committee --
9 was he on the management committee. I believe he was on the
10 management committee. I do recall him being at subsequent
11 meetings after the 6th or after the 12th, I'm sorry. But I
12 could be confusing a Board meeting with the executive
13 committee, I mean the management committee meeting.

14 Q. So Mr. Fries, you recall him as being primarily
15 being involved in committee activities?

16 A. I'm not sure. I know that he was also a part of
17 the decisions revolving around the investigation of what
18 happened. He would be at a regular Board meeting or at a
19 committee meeting.

20 Q. In Ms. Smith's report of August the 6th, '02 she
21 makes mention of the fact that she called Brian to inform
22 him of the incident since he was covering for James while
23 James was on vacation.

24 A. Yes.

25 Q. Is that when you say that was the only time you

1 were aware of that?

2 A. Can I see that.

3 Q. Sure, it's on the second page. And it's this
4 sentence right here.

5 A. Okay. Now, what was your question?

6 Q. Are you saying that it was only as a result of her
7 report to the Board that you learned that Brian was in
8 charge?

9 A. I'm not saying it was only as a result -- I'm just
10 saying I didn't learn of that until the 12th of August. So
11 it could have come from James at that meeting or it could
12 have been after reading that incident report.

13 MS. BENSON: Excuse me for a moment. Do you have
14 any questions?

15 MR. MARTINUCCI: I have a couple for you.
16

17 CROSS-EXAMINATION

18 BY MR. MARTINUCCI:
19

20 Q. Sean, these first couple of questions are going to
21 seem a little ridiculous, but this is a written transcript
22 and not a video one. So I want to make sure this is clear
23 on the record.

24 A. Okay.

25 Q. What is your race?

1 A. African American.

2 Q. What is your color?

3 A. Black.

4 Q. Now, there have been a couple of times during the
5 course of this deposition where it has been suggested or
6 other people have reported to have alleged that you used the
7 word nigger; do you remember those?

8 A. Correct.

9 Q. Now, you've denied that and I understand that
10 that's where things stand. But let me pose a hypothetical
11 to you. If you were to have used that word would it have
12 been your understanding or belief that the use of that word
13 would have been offensive to Mr. Sherrod?

14 A. No.

15 Q. Why not?

16 A. Because Mr. Sherrod and I in conversations at the
17 Center and outside of the Center have used the term in
18 conversing with each other. It is an accepted part of the
19 vernacular between he and I.

20 Q. You say it's an accepted part of the vernacular?

21 A. Right.

22 Q. Is the term always used in a negative way?

23 A. No.

24 MS. BENSON: Objection, that's speculative and
25 awfully broad. And who are you referring to,

1 always used that way.

2 A. Pardon me.

3 MR. MARTINUCCI: Let me phrase it this way.

4 MS. BENSON: The question is overly broad.

5 MR. MARTINUCCI: Fine, your objection is noted for
6 the record.

7 Q. Sean, to your understanding is the term nigger
8 always used in a negative connotation?

9 A. No, it's not.

10 Q. What is your understanding as to how it's used?

11 A. To my understanding it's the intent behind the
12 word.

13 Q. Okay.

14 A. So in conversations with whether it's Mr. Sherrod
15 or someone else if the term or derivative of the term is
16 used it depends on the intent. It could be just in
17 reference of just calling someone dude or cat. It hasn't
18 always been used to refer to only African Americans in my
19 conversations with people. But it's kind of like -- then if
20 it's used as with any other term with the intent to harm,
21 which hasn't been the case with my conversations with Mr.
22 Sherrod or anyone else, then it's not offensive. I think
23 that answers your question.

24 Q. You say that you've heard Mr. Sherrod use that
25 word?

1 A. Yes.

2 Q. You've heard him use that word at the Booker T.
3 Washington Center?

4 A. Right, in conversations with me.

5 Q. Did you recall to whom he was referring to in any
6 of those conversations?

7 A. No, it could just have been very general. About
8 things that like when we were in high school or even from
9 high school or referring to people in the community or just
10 in talking in general.

11 Q. Okay. Mr. Sherrod ultimately was the individual
12 who came to the Board with recommendations to terminate the
13 three individuals who were let go, correct?

14 A. Correct.

15 Q. Did he ever make any recommendations -- well, let
16 me phrase it this way. What recommendation did Mr. Sherrod
17 make with regard to Mr. Bessetti?

18 A. None.

19 Q. Did Mr. Bessetti report to Mr. Sherrod during that
20 period of time, was that the way the chain of command
21 worked?

22 A. You mean during the period of the incident or just
23 in general.

24 Q. During the period of the indent or at any time in
25 general?

1 A. Right, from my understanding that's how it was
2 suppose to have worked.

3 Q. Did Mr. Sherrod recommend any disciplinary action
4 against -- I forgot her first name, but Ms. Pacely the
5 temporary worker?

6 A. No.

7 Q. Do you recall what race she was?

8 A. Ms. Pacely was African American.

9 Q. You were involved with discussions and meetings and
10 ultimately votes that resulted in Mr. Sherrod's separation
11 from the Booker T. Washington Center, correct?

12 A. Yes.

13 Q. Did you take or participate in or recommend any
14 action in that regard based on Mr. Sherrod's race?

15 A. Absolutely not.

16 Q. Did you take, recommend, or participate in any
17 action with regard to taking or not taking disciplinary
18 action against Brian Bessetti because of his race?

19 A. Absolutely not.

20 Q. Do you know of any other Board member who used race
21 as a consideration in any of these events?

22 A. No.

23 Q. Bill Jeffress is the current executive director of
24 the Booker T. Washington Center.

25 A. Yes.

1 Q. What's his race?

2 A. African American.

3 Q. What's his color?

4 A. Black.

5 MR. MARTINUCCI: Thank you, I have nothing further.

6 MS. BENSON: Let me just go back.

7

8

REDIRECT EXAMINATION

9 BY MS. BENSON:

10

11 Q. You've just testified that Mr. Sherrod came to the
12 Board with recommendations of firing those three
13 individuals. Which Board meeting did he come to with those
14 recommendations?

15 A. Can you rephrase that?

16 Q. You just testified that Mr. Sherrod came to the
17 Board with recommendations to fire Howard, Smith, and
18 Johnson. At which Board meeting did he make that
19 recommendation?

20 A. I must have misstated what James had done, or what
21 Mr. Sherrod had done.

22 MR. MARTINUCCI: I probably misstated.

23 A. He contacted me and told me that was what he was
24 going to do, which he didn't have to, but he did because we
25 were corresponding during this episode or this situation.

1 And then he had fired the three employees via a letter. I'm
2 assuming he had called them into the office and gave them a
3 letter and then the Board was then notified of that by Mr.
4 Sherrod.

5 Q. When was the Board notified?

6 A. I don't recall. The reason I say -- because
7 everyone knew about it. So people on the Board had to be
8 notified in some capacity or unless they just found out the
9 day of the 12th.

10 Q. Meaning when there was a Board meeting.

11 A. Right.

12 Q. You mean the Board members found out on the 12th;
13 is that what you're trying to say?

14 A. Again, I'm speculating when they found out. It
15 would have had to have been between the day of the incident
16 and the 12th.

17 Q. Now, you say the use of the word, depending on the
18 intent, causes harm.

19 A. Can.

20 Q. It can cause harm.

21 A. Depends on how the person interprets it.

22 Q. If that word, nigger, is used in instructions that
23 goes like, fire those niggers, would you say the intent was
24 to cause harm?

25 A. I can't answer that at all because you are implying

1 that I made that statement and I didn't make that statement.

2 Q. But I'm simply asking you.

3 A. But you said earlier that I did, so how can I
4 answer a question to a statement that I didn't --

5 Q. If the intent is to fire someone?

6 A. Okay.

7 Q. Would you say that just firing in and of itself
8 causes harm?

9 A. Firing someone causes harm.

10 Q. Sure.

11 A. Potentially, if the action warrants to be fired.

12 Q. Potentially because?

13 A. If the person or people, whomever the action must
14 have warranted their being terminated.

15 Q. Well, that's not always the case, is it? My
16 question to you is this here. If you fire someone that does
17 cause harm; doesn't it?

18 A. Again, I look at things like it's a matter of cause
19 and effect. If I did something that required me to be
20 fired, does it cause harm, depending on how you view it.
21 Did my action dictate me being fired?

22 Q. Would someone being fired -- they would lose their
23 financial resources, right?

24 A. Yes.

25 Q. You're in the process of moving, going to

1 Philadelphia to relocate for a job, right?

2 A. Right.

3 Q. Without income you and I could not survive, right?

4 A. Right.

5 Q. So if someone is fired, just speaking in general
6 now, that does cause harm whether or not their actions may
7 have justified it, right, they suffer some harm?

8 A. They suffer consequence.

9 Q. Which in some instances is economic, right?

10 A. And some others --

11 Q. And some are psychologically and emotionally,
12 right?

13 A. They can or they cannot.

14 Q. Now, let's go back to this here. If the word
15 nigger is used in a direction, directive, fire those
16 niggers, would you say that that indicates who is being
17 designated to be fired?

18 A. No.

19 Q. So it does not identify individuals from a
20 particular group to be --

21 A. I think I asserted that part of my answer earlier.
22 It depends on how it's interpreted.

23 Q. Well, we live in a society here in the United
24 States that that word is implied to African Americans; isn't
25 it?

1 A. Actually depends on what generation you grew up in.
2 The word is very universal now, extremely universal now and
3 has been so for the past decade.

4 Q. Mr. Coleman, the end result was that only three
5 people were fired and they were all African Americans,
6 right?

7 A. By your client.

8 Q. And then my client was fired, right?

9 A. Correct.

10 Q. And he's an African American?

11 A. Right.

12 Q. And the one person that wasn't fired in all of this
13 was white, the controller. Did you make recommendations
14 that he be fired, the controller?

15 A. Pardon me.

16 Q. Did you make recommendations that the controller be
17 fired?

18 A. I made a suggestion or recommendation that
19 disciplinary action should be taken against the controller.

20 Q. What specific disciplinary action?

21 A. I didn't get into it. We didn't get into it that
22 far.

23 Q. Now, once you learned that the controller was in
24 charge on August the 6th, sitting in that meeting on August
25 the 12th did you realize that Mr. Sherrod was not there and

1 therefore should not be fired?

2 A. I know he wasn't there, but I didn't believe that
3 he should not have been fired. He actually wasn't fired at
4 that meeting.

5 Q. He was asked to resign at that meeting.

6 A. Correct.

7 Q. And would you say that asking him to resign was in
8 effect firing him?

9 A. No, because we asked him for his resignation.

10 Q. Wasn't his keys taken from him that day?

11 A. I do not recall because he gave his verbal
12 resignation. So if his keys had been taken from him that
13 would have been as the result of his resignation.

14 Q. So, if Mr. Jeffress were to say that he, Mr.
15 Jeffress, left the Board meeting and went to Mr. Sherrod and
16 said, give me your keys Mr. Jeffress would not be telling
17 the truth.

18 A. I did not say that, I said I don't recall. But I
19 said it would be taken as the result of his resignation.

20 MS. BENSON: Okay.

21

22 RE CROSS-EXAMINATION

23 BY MR. MARTINUCCI:

24

25 Q. Sean, just so I'm clear on the chain of events

1 leading up to the termination of the three employees.
2 You're saying here that that was Mr. Sherrod's decision and
3 that he didn't have to check with you or any other Board
4 member before he disciplined or fired any employees.

5 A. Correct.

6 Q. Would that include Mr. Bessetti?

7 A. Correct.

8 Q. To your knowledge did Mr. Sherrod ever take any
9 action against Mr. Bessetti?

10 A. No, he didn't to my knowledge.

11 MR. MARTINUCCI: Thank you, nothing further. As
12 Ms. Benson said at the beginning of the deposition
13 you do have the right to review this transcript
14 before it becomes an official part of the record.
15 If you want to, the court reporter will need an
16 address for you, or I'll need an address for you so
17 we can send you a copy of it. You'll have 30 days
18 to review it once she sends the transcript out.
19 There's a sheet attached to the back called an
20 Errata Sheet where you will have an opportunity to
21 say okay, well, it says this on Page 24, line 15,
22 and it should say that. And you sign it at the end
23 to certify that what you're putting down on the
24 Errata Sheet is true and correct. It's completely
25 up to you whether or not you do that.

1 MS. BENSON: And only -- not to change a response.

2 A. Do I have to correct it?

3 MR. MARTINUCCI: No, you don't?

4 A. Okay.

5 MS. BENSON: Let me just go to make sure for the
6 record. Plaintiff Exhibit Number 1 is the Booker
7 T. Washington Board of Director list from January
8 of 2002 to December 2002. Plaintiff Exhibit Number
9 2 is the termination letter dated September 24th,
10 '02. Plaintiff Exhibit Number 3 is the notes of --
11 a summary of the executive committee meeting on
12 September the 13th, 2002. Plaintiff Exhibit Number
13 4 is the narrative, three-page narrative here from
14 the Booker T. Washington Center. And Plaintiff
15 Exhibit Number 5, August 16th, 2002, a letter from
16 Mr. Sherrod to Mr. Hamilton indicating that he had
17 not and was not going to resign his position.
18 Plaintiff Exhibit Number 6 is a note from that, it
19 has been identified from Mr. Bill Jeffress, it is
20 not dated. So those are that and if you would give
21 me back that and then I can give it to her rather
22 than give it from my notes.

23

24 (Deposition concluded at 4:05 p.m.)

25

1 COMMONWEALTH OF PENNSYLVANIA :

2 COUNTY OF ERIE :

3

4 I, Heather E. Nass, Notary Public in and for the
5 Commonwealth of Pennsylvania, do hereby certify that I
6 recorded, stenographically, the deposition of SEAN P.
7 COLEMAN, held on June 28th, 2005. Further, that I am not an
8 employee or an attorney of any of the parties, or a
9 relative, or employee of any counsel, and that I am in no
10 way interested directly or indirectly in this action. IN
11 WITNESS THEREOF, I have set my hand and affixed my seal of
12 office this 18th day of July, 2005.

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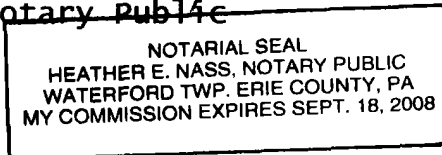
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SIGNATURE PAGE

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I, SEAN P. COLEMAN, have read the foregoing transcript
of my deposition, and affix my signature in approval of the
correctness of my statement, except for corrections noted on
the Amendment Page.

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SEAN P. COLEMAN

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DATED: _____

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Corrections noted on Amendment Page

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Yes _____

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No _____

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